

**Koppers, Mary Margaret**

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**From:** Larry LaFleur[SMTP:LLaFleur@WCRC-NCASI.ORG]  
**Sent:** Wednesday, July 01, 1998 8:54 AM  
**To:** IMCEASTMP-telliard+2Ewilliam+40epamail+2Eepa+2Egov@WCRC-NCASI.ORG  
**Subject:** ML Meeting summary



Part.001



WordPerfect 5.1

Bill,

Below is a text only copy of the memo as well as a WordPerfect 5.x for windows version. I have also tried to "paste" it into this e-mail. Surely one will be readable. Take a look. I'll be going back over to the NELAC meeting this morning so I will try to call sometime before you disappear into your afternoon meeting. If you don't hear from me, respond by e-mail as I will be checking after the ELAB meeting.

I am now staying at the Adam's Mark at 210 354-2800 room 1826. The FAX is 210 354-2700 if you prefer.

Larry LaFleur *June 1 1998*

On July 25th, I met with Bill Telliard in Alexandria to discuss a possible compromise interim ML. Bill had mentioned our meeting the previous day with some of his management. Bill and his management indicated that the Office of Water had already agreed to conduct the longer term study and had committed considerable time and money towards that end. The Office of Water sees no need for any interim compromise and felt it was more an issue for the permits/enforcement branch that authored the original 1994 Draft permit writers guidance.

In the meeting with Bill, I clearly stated our positions that the any interim compromise would not obviate the need for the longer term solution and that it would not prejudice either EPA or IIAG in the final peer review process. With the apparent lack of support from his management, and no real benefit for the Agency, Bill couldn't see any reason to pursue any compromise. Even if we came up with a technical compromise, he doubted he could persuade the permits/enforcement folks into accepting it. He also saw bureaucratic problems with having one procedure for a ML that didn't have a low WQBEL associated with it and another "special" procedure (such as the one the IIAG had agreed to offer as an interim compromise) for WQBEL. Bill couldn't think of a creditable justification or rationalization for any such approach or for the Agency to adopt any interim approach.

The bottom line is that the message I got from Bill is that the Office of Water has already negotiated with the IIAG and agreed to pursue the careful technical evaluation of the ML issue (the longer term study approach) and sees no benefit for the Agency in pursuing an interim compromise. My guess is that Bill hoped that we would be happy enough with an interim solution that he could drop the long term study and save \$200,000 worth of analytical work.. Since we made it clear that that was not the case and without any real support from management, Bill clearly has no real incentive to consider any compromise.

I did start (but we never finished) to go through our suggested "new method" proposal and Bill pointed out that they had no intention of pursuing new methods that did not have MDLs well below the WQBEL and that there would not be an issue. We discussed multi-analyte methods like the ICP/MS method where the method had MLs below WQBEL for most analytes but may fall short for one or two. Bill said for those metals they were looking into hydride furnace methods that might meet the sensitivity requirements. It was at this point that we stepped back and asked ourselves if we really needed to explore the ILAG proposal any further and Bill quite frankly said that this was more of a "policy" or implementation issue at this point than a difference of opinion in technical issues (although it is also that). We agreed that there was no point in discussing it further.

Office of Water has could not seen where anyone is really being "hurt" by the current approach. Who has been fined? Who has been wrongly judged out of compliance? They may be more interested if we could show him that there is a real problem today. If it's just concern over what might happen to us sometime in the future, they are willing to continue the current course of action (the long term solution) until such a "crisis" erupts.

It was suggested that we might want to look at the wording in the GLI re: establishing limits. To paraphrase Bill's interpretation, "use the ML if the method has one; use any method you want to establish an ML if the method doesn't specify one."